

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

CRIM. NO. 02-030043-MAP

Plaintiff,

02CR30043-MAP

vs.

ROMAN ZHIRNOV,

Defendant.

**DEFENDANT ROMAN ZHIRNOV'S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE IN LIMINE MOTIONS, VOIR DIRE QUESTIONS,
AND PROPOSED JURY INSTRUCTIONS**

Now comes the Defendant, ROMAN ZHIRNOV, by and through his attorney, Charles J. Sclafani, Jr., and hereby moves this Honorable Court for an extension of time until November 21, 2005 in which to file Motions in limine, voir dire and jury instructions. In support hereof, Defendant would benefit from this short extension of time and counsel has been aware of the pendency of Defendant Ivan Teleguz Motion on the same request, which Motion was just recently granted.

Wherefore, Defendant requests that this Motion be granted.

November 18, 2005

THE DEFENDANT,
BY HIS ATTORNEY,

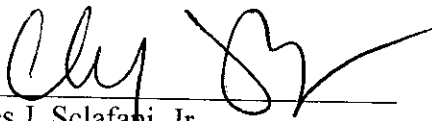


Charles J. Sclafani, Jr.
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CERTIFICATE OF SERVICE

I, Charles J. Sclafani, Jr., attorney for the Defendant, Roman Zhirnov, hereby certify that on this 18th day of November 2005, I served a copy of the foregoing **DEFENDANT ROMAN ZHIRNOV'S MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE IN LIMINE MOTIONS, VOIR DIRE QUESTIONS, AND PROPOSED JURY INSTRUCTIONS** by in hand delivery to the Assistant U.S. Attorney, Kevin O'Regan, Federal Building & Courthouse, 1550 Main Street, Springfield, MA 01103



Charles J. Sclafani, Jr.